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11 || *Attorneys for Plaintiff and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

17 JOSE MORAN, *individually and on behalf
of others similarly situated,*

Case No. 5:25-cv-476

Plaintiff,

**PLAINTIFF'S NOTICE OF PENDENCY
OF RELATED ACTIONS**

v.

PAYPAL INC. and PAYPAL HOLDINGS, INC..

Defendant.

1 Pursuant to Civil Local Rule 3-13, Plaintiff Jose Moran, individually and on behalf of all
 2 others similarly situated, respectfully advises the Court of the following Related Actions:

- 3 1. *Wendover Productions, LLC et al v. PayPal Inc.*, No. 5:24-cv-09470 (the “Wendover
 Action”), pending before Judge Freeman;
- 4 2. *Silva et al. v. PayPal Holdings, Inc. et al.*, No. 5:24-cv-09510, pending before Judge
 van Keulen;
- 5 3. *GamersNexus LLC v. PayPal Holdings, Inc. et al.*, No. 5:25-cv-00114, pending before
 Judge Freeman;
- 6 4. *Young v. Paypal, Inc. et al.*, No. 5:25-cv-124, pending before Judge Lee; and
- 7 5. *Coleman v. PayPal Holdings, Inc. et al.*, No. 5:25-cv-00367, pending before Judge
 Cousins (collectively, the “Related Actions”).

8 This action overlaps significantly with the newly-filed Related Actions.¹ First, this action
 9 and the Related Actions name overlapping defendants—PayPal Inc. and PayPal Holdings, Inc
 10 (“PayPal”). Second, this action and the Related Actions make substantially similar factual
 11 allegations. Specifically, they allege that PayPal diverted commissions due to Plaintiffs and class
 12 members via the use of its Honey web browser extension. Third, this action and the Related
 13 Actions involve overlapping class definitions. And finally, this action and the Related Actions
 14 bring overlapping claims for tortious interference, conversion, and unjust enrichment. As a result,
 15 the adjudication of this action will require resolving the same or substantially similar questions of
 16 law and fact as those posed by the Related Actions. Therefore, coordination with the Related
 17 Actions would avoid conflicts, conserve resources, and promote the efficient adjudication of this
 18 action.

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 28 ¹ Plaintiffs in one of the Related Actions have filed an unopposed administrative motion to
 consider whether cases should be related, pursuant to Civil Local Rule 3-12. *Wendover Prods.*,
 No. 5:24-cv-09470, ECF No. 11.

1 Dated: January 14, 2025

Respectfully submitted,

2 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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4 By: /s/ Roger N. Heller
5 Roger N. Heller

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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2025, I caused the foregoing to be electronically filed and served with the Clerk of the Court using the CM/ECF system to all parties of record.

/s/ Roger N. Heller
Roger N. Heller